

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SCANTIBODIES LABORATORY, INC.,

Plaintiff,

-against-

CHURCH & DWIGHT CO., INC.,

Defendant.

No: 14 Civ. 2275 (JGK)

**PLAINTIFF'S
SUPPLEMENTAL RULE 26(a)
DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(1), Plaintiff Scantibodies Laboratory, Inc. ("SLI" or "Plaintiff"), by its undersigned attorneys, hereby submits to Defendant Church & Dwight Co., Inc. ("C&D" or "Defendant"), the following Initial Disclosures.

GENERAL QUALIFICATIONS

These initial disclosures are based on information reasonably available to Plaintiff as of the date hereof, and Plaintiff reserves the right to supplement these disclosures as circumstances warrant. In addition, Plaintiff expressly reserves all objections to the use for any purpose of these Initial Disclosures or any of the information received herein in this case or any other case or proceeding..

1. COMPUTATION OF DAMAGES

Plaintiff estimates its damages to be in excess of \$20,000,000 as computed below:

- a. Lost profits – Approximately \$16,003,665 for 19 months of profits. From May 2009 to May 2010, SLI sold C&D 30,180,988 pregnancy test kits. The total sales revenue was \$20,584,385. The cost of sales was \$10,476,808. This computation is only an approximation because the lost profits may be higher because of market growth, cost savings, C&D's increased future requirements, C&D's deception about past requirements. The years 2009 and 2010 were selected as benchmark years because C&D began Project Pink in 2011. The damages are supported by the documents produced to C&D on October 14, 2014 and December 9, 2014.

- b. Raw Material Scrapping Costs - \$1,989,241.13 as detailed in the letter sent to Richard Goldstein on February 19, 2014.
- c. Equipment and Upgrade Costs – \$1,200,058.05 as detailed in the letter sent to Richard Goldstein on February 19, 2014.
- d. Compliance with Mexican Labor Law After C&D Breached the Supply Agreements - \$471,719 as detailed in the documents produced by SLI to C&D on October 14, 2014 and December 9, 2014.
- e. Attorneys' fees, Interest, and Costs – To be determined

DATED: New York, New York
December 15, 2014

By: /s/ Rishi Bhandari

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